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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 BRIAN BORENSTEIN, an individual,  
18  
19 Plaintiff,  
20  
21 vs.  
22 THE ANIMAL FOUNDATION, a domestic  
23 nonprofit corporation; *et al.*  
24 Defendants.

Case No.: 2:19-cv-00985-APG-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR PLAINTIFF TO RESPOND  
TO [ECF 202] DEFENDANTS THE  
ANIMAL FOUNDATION AND CARLY  
SCHOLTEN'S MOTION TO DISMISS  
[ECF NO. 189] & RENEWED SPECIAL  
ANTI-SLAPP MOTION TO DISMISS  
UNDER NRS 41.637  
(Third Request)**

25 COME NOW Plaintiff, Brian Borenstein, by and through his counsel, Raelene K.  
26 Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., and Defendants, The  
27 Animal Foundation and Carly Scholten, by and through their counsel, Kerry E. Kleiman, Esq.,  
28 of the law firm Reid Rubinstein & Bogatz, and hereby request the Court to extend the deadline

1 for Plaintiff to respond to [ECF 202] *Defendants The Animal Foundation and Carly Scholten's*  
2 *Motion to Dismiss [ECF No. 189] & Renewed Special Anti-Slapp Motion to Dismiss Under*  
3 *NRS 41.637* by one week from **Friday, October 15, 2021** to **Friday, October 22, 2021**.

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Plaintiff has requested this extension due to a mediation in another matter, scheduled for October 14, 2021, requiring Attorney Palmer to travel to Reno, Nevada, which mediation was scheduled after the parties stipulated to the October 15, 2021 deadline, and the Court granted the request, *see* ECF No. 199. Attorney Melcic is likewise experiencing personal and family medical problems, *see* ECF No. 215, which motion was subsequently withdrawn, *see* ECF No. 217. The parties submit that this request is made in good faith and not for the purpose of undue delay.

DATED this 13th day of October 2021.

THE PALMER LAW FIRM, P.C.

By: / s / **Raelene K. Palmer**

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DATED this 13th day of October 2021.

REID RUBINSTEIN & BOGATZ

By: / s / **Kerry E. Kleiman**

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*Attorneys for Defendants, The Animal Foundation and Carly Scholten*

### ORDER

IT IS SO ORDERED.

DATED: \_\_\_\_\_, October 14, 2021.

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2021, I caused to be served a copy of the foregoing *Stipulation and [Proposed] Order for Plaintiff to Respond to [ECF 202] Defendants The Animal Foundation and Carly Scholten's Motion to Dismiss [ECF NO. 189] & Renewed Special Anti-Slapp Motion to Dismiss Under NRS 41.637 (Third Request)*, by electronic filing through the Court's CM/ECF system, addressed to:

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An employee of The Palmer Law Firm, P.C.